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Attorneys for Defendant Six Flags Theme Parks, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JOANNA LYNN MASCI and
JOSEPH MASCI,

Plaintiffs,

vs.

SIX FLAGS THEME PARKS, INC.,

Defendant.

Civil Action No. 12-cv-06585-JAP-DEA

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

Motion Date: May 19, 2014

Oral Argument Requested

Document Filed Electronically

TO: Anthony J. Brady, Jr., Esq.
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P.O. Box 129
Maple Shade, NJ 08052
Attorney for Plaintiffs

PLEASE TAKE NOTICE that on **Monday, May 19, 2014 at 10:00 a.m.**,
or soon thereafter as counsel may be heard, Defendant Six Flags Theme Parks, Inc.
("Six Flags"), by and through its counsel Sheppard, Mullin Richter & Hampton LLP,
shall appear before the Honorable Joel A. Pisano, U.S.D.J., at the Clarkson S.
Fisher Building & U.S. Courthouse, 402 East State Street, Court Room 1, Trenton,

NJ 08608, and shall move this Court for an Order: (i) granting Six Flags summary judgment pursuant to Federal Rule of Civil Procedure 56 on Plaintiffs Joanna Lynn Masci and Joseph Masci (collectively, "Plaintiffs") claims of disability discrimination under the Americans with Disabilities Act and the New Jersey Law Against Discrimination, on the grounds that there are no triable issues of fact with regard to such claims and Six Flags is entitled to summary judgment as a matter of law; (ii) dismissing Plaintiff's Complaint in its entirety; and (iii) awarding Six Flags such other and further relief, including costs and attorneys' fees, as the Court deems just and proper;

PLEASE TAKE FURTHER NOTICE that in support of its Motion for Summary Judgment, Defendants shall rely upon its accompanying Brief, Declaration of Leonard Turtora, dated April 22, 2014, with the exhibits attached thereto, the Declaration of Patrick Hoffman, dated April 22, 2014, with the exhibits attached thereto, the Declaration of Lawrence Chickola, dated April 24, 2014, with the exhibits attached thereto, the Declaration of John Paul Scott, dated April 22, 2014, with the exhibits attached thereto, and the Declaration of Sean J. Kirby, dated April 24, 2014, with the exhibits attached thereto, Six Flags' Rule 56.1 Statement of Undisputed Facts, any Reply papers submitted, and oral argument, which is specifically requested herein.

Also enclosed herewith is a proposed form of Order for the Court's consideration.

Dated: New York, New York
April 24, 2014

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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